

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA**

DS ADVANCED ENTERPRISES,  
LTD.,

Plaintiff,

v.

COOPER LIGHTING, LLC,  
Defendant.

**Civil Case No.: 1:24-cv-05643-TRJ**

**NOTICE OF PLAINTIFF DS ADVANCED ENTERPRISES, LTD.'S  
MOTION FOR PARTIAL SUMMARY JUDGEMENT MOTION OF  
PATENT INFRINGEMENT**

**TO THIS COURT, ALL PARTIES, AND COUNSEL OF RECORD:**

PLEASE TAKE NOTICE that, as soon as the matter may be heard by this Honorable Court, located at 1767 Richard B. Russell Federal Building and United States Courthouse 75 Ted Turner Drive, SW Atlanta, GA 30303-3309, the Plaintiff, DS Advanced Enterprises, Ltd. (“DSAE”), respectfully moves this Court to grant summary judgment against Defendant, Cooper Lighting, LLC (“Cooper”). Specifically, DSAE moves this Court to grant partial summary judgement as to DSAE’s claim of patent infringement pursuant to 35 U.S.C. § 271.

The grounds supporting this Motion includes Fed. R. Civ. P. 56, which allows this Court to grant partial summary judgment if the movant shows that there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. Fed. R. Civ. P. 56(a).

This Motion is based on this Notice, the accompanying Motion brief, all pleadings and papers on file herein, and upon such evidence and arguments as this Honorable Court may allow at the time of hearing.

Dated: February 5, 2025

By: /s/ Patrick Cummins

Patrick Cummins, CA Bar No. 294400 (admitted *pro hac vice*)

Attorney for DS Advanced Enterprises, Ltd.

Patrick@CumminsIP.com

Cummins Intellectual Property (IP) Law PLLC

348 E Main St

Lexington, KY 40507  
Telephone: (502) 445-9880

By: /s/ Bryan Henderson

Brian Henderson (GA Bar No. 821624)  
Attorney for DS Advanced Enterprises, Ltd.  
GUILMETTE PULVER LLC  
1355 Peachtree St NE STE 1125  
Atlanta, GA 30309  
Telephone: (833) 377-3060  
b.henderson@guilmettepulver.com